

**IN THE UNITED STATES BANKRUPTCY
COURT FOR THE NORTHERN DISTRICT OF
IOWA**

In re:

MERCY HOSPITAL, IOWA CITY, IOWA, *et al.*,

Debtors.

Chapter 11

Case No. 23-00623 (TJC)

Jointly Administered

**NOTICE OF MOTION OF IOWA CITY AMBULATORY SURGICAL
CENTER, LLC FOR ENTRY OF AN ORDER GRANTING RELIEF
FROM THE AUTOMATIC STAY TO ISSUE A NOTICE OF INTENT
TO OBTAIN A PURCHASE PRICE DETERMINATION**

PLEASE TAKE NOTICE that, on March 1, 2024, the *Motion of Iowa City Ambulatory Surgical Center, LLC for Entry of an Order Granting Relief From the Automatic Stay to Issue A Notice of Intent to Obtain a Purchase Price Determination* (the “Motion”) was filed with the United States Bankruptcy Court for the Northern District of Iowa (the “Court”).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion or the relief requested therein must be filed with the Court and served so as to be received by the following parties no later than March 15, 2024:

- (a) Counsel to Johnson County Surgeon Investors, LLC, Faegre Drinker Biddle & Reath LLP, 320 S. Canal Street, Suite 3300, Chicago, IL 60606, Attn: Michael T. Gustafson (mike.gustafson@faegredrinker.com), Jesse Linebaugh (jesse.linebaugh@faegredrinker.com); and
- (b) Office of the United States Trustee for the Northern District of Iowa, 111 Seventh Avenue SE, Suite 2800, Cedar Rapids, IA, 52401, Attn: Janet G.L. Reasoner (Janet.G.Reasoner@usdoj.gov).

PLEASE TAKE FURTHER NOTICE that, if an objection is properly filed and served in accordance with the above procedures, a hearing (the “Hearing”) on the Motion will be held at a time and date to be determined before the Honorable Thad J. Collins, United States Bankruptcy Judge, United States Bankruptcy Court for the Northern District of Iowa, 111 7th Ave. SE, Cedar Rapids, IA 52401. Only objections made in writing and timely filed and received will be considered by the Court at such Hearing.

Dated: March 1, 2024

/s/ Michael T. Gustafson

Michael T. Gustafson (*Admitted pro hac vice*)
FAEGRE DRINKER BIDDLE & REATH LLP
320 S. Canal Street, Suite 3300
Chicago, IL 60606
Phone: (312) 569-1000
Fax: (312) 569-3000
Email: mike.gustafson@faegredrinker.com

*Counsel to Iowa City Ambulatory Surgical
Center, LLC*

Certificate of Service

The undersigned certifies, under penalty of perjury, that on this 1st day of March, 2024, the foregoing document was electronically filed with the Clerk of Bankruptcy Court using the Northern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to the parties of this case.

Executed: March 1, 2024

/s/ Michael T. Gustafson
Partner, Faegre Drinker LLP